

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$13,040.00 IN UNITED
STATES CURRENCY,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Bridget J. Schoenborn, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit property to the United States of America, under 21 U.S.C. § 881(a)(6), for violations of 21 U.S.C. § 841(a)(1).

The Defendant In Rem

2. The defendant property, approximately \$13,040.00 in United States currency, was seized on or about September 1, 2022, from Amber Lentz and an individual having the initials J.L.A.O. at or near 490 East Cedar Street, Pulaski, Wisconsin.

3. The defendant property is presently in the custody of the United States Marshal Service in Green Bay, Wisconsin.

Jurisdiction and Venue

4. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

6. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

7. The defendant property, approximately \$13,040.00 in United States currency, is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

Facts

8. Marijuana is a Schedule I controlled substance under 21 U.S.C. § 812.

9. Fentanyl is a Schedule II controlled substance under 21 U.S.C. § 812.

10. Methamphetamine is a Schedule II and III controlled substance under 21 U.S.C. § 812.

September 1, 2022 arrest of J.L.A.O and Amber Lentz

11. On September 1, 2022, a confidential informant (“CI”) contacted J.L.A.O. via Facebook messenger and placed a controlled order-up of one ounce of methamphetamine for \$720.

12. The CI had purchased methamphetamine from J.L.A.O. approximately 100 to 200 times in the past.

13. Amber Lentz was usually present with J.L.A.O. when J.L.A.O. conducted the drug transactions with the CI.

14. On or about September 1, 2022, the CI asked J.L.A.O. if CI could purchase "the same as last time," which was approximately one ounce of methamphetamine for \$720.

15. J.L.A.O. agreed to sell the CI approximately one ounce of methamphetamine for \$720.

16. The meet location for the drug transaction was changed multiple times during the CI and J.L.A.O.'s communications.

17. On September 1, 2022, officers conducted surveillance at 1XXX Arthur Boulevard, Pulaski, Wisconsin, which is the residence of Amber Lentz.¹ A blue Dodge Avenger registered to Amber Lentz was parked at the residence.

18. At about 7:55 p.m., Amber Lentz and J.L.A.O. exited the residence, entered the Dodge Avenger, and drove away. Officers maintained surveillance on the Dodge Avenger, and the vehicle did not stop anywhere along the way prior to arriving at the meet location.

19. The CI then contacted J.L.A.O. via Facebook to confirm whether J.L.A.O. was at the meet location. J.L.A.O. replied that J.L.A.O. was at the meet location in a blue car. During that conversation a female voice, believed to be Amber Lentz, directed the CI to follow their (Lentz and J.L.A.O.'s) vehicle when the CI got to the meet location.

20. At about 8:35 p.m., in a parking lot at 490 East Cedar Street in Pulaski, officers drove up to the Dodge Avenger and used vehicle containment to surround the Dodge Avenger to prevent the occupants from fleeing.

¹ Throughout this complaint, certain information has been redacted using the letter "X" as a means of avoiding the revelation of any personal information.

21. Amber Lentz was the driver of the Dodge Avenger, and the sole passenger was J.L.A.O.

22. Amber Lentz made several unsuccessful attempts to break officers' containment by striking officers' vehicles with her Dodge Avenger in an attempt to flee the scene.

23. Officers eventually arrested Amber Lentz and J.L.A.O.

24. On J.L.A.O.'s person, inside a fanny pack, were the following:

- A. A total of approximately 1.9 grams of methamphetamine.
- B. A total of approximately 70 fentanyl pills.
- C. A digital scale with residue.

25. Inside the Dodge Avenger were the following:

A. A total of approximately 195.78 grams of methamphetamine located as follows:

- i. Inside a cell phone box were five baggies containing a total of approximately 111.99 grams of methamphetamine.
- ii. Inside a purse were two baggies containing a total of approximately 55.98 grams of methamphetamine.
- iii. Between the center console and front passenger seat was a bag containing approximately 27.81 grams of methamphetamine.

B. Approximately 1.67 grams of marijuana.

C. Approximately 36 rounds of ammunition in the center console.

D. Drug paraphernalia.

E. An Adidas bag that contained the following:

- i. A black and pink handgun with a magazine loaded with six rounds of ammunition.
- ii. A digital scale.
- iii. A total of approximately 2.32 grams of marijuana.

iv. Approximately \$13,040 in United States currency, which is the defendant property in this case.

26. An additional \$169 and \$145 were located in J.L.A.O.'s wallet and Amber Lentz's purse, respectively, and were returned to J.L.A.O. and Lentz.

27. A drug detection canine gave a positive alert to the odor of a controlled substance on the approximately \$13,040.00 in United States currency.

September 1, 2022 execution of search warrant at Amber Lentz's residence

28. On September 1, 2022, officers executed a search warrant at the residence of Amber Lentz, 1XXX Arthur Boulevard, Pulaski, Wisconsin (the "Residence"), which is a single-family mobile home-style residence with two bedrooms.

29. Present during execution of the warrant were two individuals having the initials C.L. and J.B.

30. The following items, among other things, were inside the Residence:

A. In Amber Lentz's bedroom were the following:

- i. A digital scale with residue on the plate.
- ii. Approximately six rounds of ammunition.
- iii. Approximately thirteen unknown pills and two fentanyl pills.
- iv. One safe. Inside the safe were the following:
 - a. Seven baggies containing a total of approximately 137.55 grams of methamphetamine.
 - b. One baggie containing approximately 3.26 grams of marijuana.
 - c. Seven baggies containing a total of approximately 578 fentanyl pills.
 - d. One baggie containing three Clonazepam pills, a Schedule IV controlled substance.

- e. Approximately \$508.00 in United States currency.²
- B. In the kitchen was approximately 3.82 grams of marijuana.
- C. In C.L.'s bedroom were approximately 9.42 grams of marijuana and drug paraphernalia.

Samples of drug-related text messages on Amber Lentz's cell phone

31. On September 14, 2022, pursuant to a search warrant, officers conducted a forensic download of Amber Lentz's cell phone.

32. Based upon their training, experience, and knowledge of the investigation, officers found evidence on Amber Lentz's cell phone of communications between Lentz and other individuals involving the sales of controlled substances, including pressed fentanyl pills, methamphetamine, and possibly other controlled substances.

33. Samples of drug-related text messages between Amber Lentz and an individual having the initials A.Y. are as follows:

A. On July 16, 2022 –

A.Y.: What's up girl?
A.Y.: I have enough to get 8 if you still can
LENTZ: I'm in pulaski
A.Y.: Could we come there
A.Y.: I have enough to get 7 and I can make the drive
A.Y.: Could be there in 20 mins
LENTZ: Yes
A.Y.: .for sure?
A.Y.: Should I head out now?
A.Y.: Just calling dude to get the money and I'll head that way
A.Y.: On our way just gotta stop for gas and to take the money out gotta use some for gas but will still take 8
LENTZ: Okay text don't knock
LETNZ: If anything call me and park a few houses down ? (:
A.Y.: Okay sounds good
LENTZ: Did you leave yet ? If you give my friend a ride to me from the east side
LENTZ: I'll throw you a few [emojis]

² The approximately \$508 is not part of the defendant currency in this case.

A.Y.: I did already I'm about 15 min away from you I'm sorry girl
LENTZ: It's ok.

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz sold A.Y. at least eight pressed fentanyl pills.

B. July 19, 2022 –

A.Y.: Are you in green bay?

LENTZ: Yes

A.Y.: Bet are you still doing them for \$12 a pop?

A.Y.: Just lmk I have a sale and they would have to go to work soon

A.Y.: Parked in front of the game store

A.Y.: Are you still in GB? I have a sale for some more

LENTZ: Yes

A.Y.: Would you be able to do 8 for \$85

A.Y.: Can we meet you before you leave GB

LENTZ: Silver suv.

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz conspired with A.Y. to sell A.Y. eight pressed fentanyl pills with the understanding that A.Y. planned on selling the pills to an unknown individual.

C. July 20, 2022 –

A.Y.: Did you end up getting any more?

LENTZ: Yeah love I got hundreds lol

A.Y.: Bet, how much are you doing them for?

A.Y.: Could you do like 15 for \$140?

A.Y.: Are you still in GB?

LENTZ: Yes I am && & I can do 10 for 140

A.Y.: Okay would you be able to do the 10 for 105 like yesterday?

LENTZ: No

LENTZ: I gotta go home /: if yu come to me I can do the 10 for 119

LENTZ: 110

A.Y.: Okay sounds good just lmk when you're home and well head that way

LENTZ: I'm home love

LENTZ: Sorry I had a lot going on at the minute didn't mean to sound rude lol [emojis]

A.Y.: Okay no worries, were heading out now

A.Y.: Would we be able to grab 13 from you for \$140

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz sold A.Y. at least 10 pressed fentanyl pills.

D. July 21, 2022 –

A.Y.: Are you in GB by chance?

LENTZ: Gonna b

A.Y.: Okay bet just lmk when you are I have another sale for you

A.Y.: Did you make it into GB yet? Have a sale but dude has to work at 330

LENTZ: Two minutes away my bad

A.Y.: No worries, same for us

A.Y.: Pulling up now

A.Y.: Are you still in GB?

A.Y.: Lmk have a sale for another 10/12

LENTZ: If you wanna drive to pulaski you can otherwise I'll be back in Green bay with in about an hour.

A.Y.: Where did you want to meet?

A.Y.: And would you be able to do like 17 for \$180?

A.Y.: Actually could you do 15 for \$160?

A.Y.: On our way

A.Y.: Were here

A.Y.: Parked in the apartment parking lot

A.Y.: I just saw you drive past

A.Y.: Im in the first parking lot on the left I think you went to the second one

LENTZ: Here

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz conspired with A.Y. to sell A.Y. pressed fentanyl pills with the understanding that A.Y. planned on selling the pills to at least two unknown individuals.

E. August 13, 2022 –

A.Y.: Are you in GB rn?

LENTZ: Yedb

A.Y.: Okay bet, would you be able to do like 9 for \$90 for us girl?

A.Y.: Are you on 9th?

LETNZ: Yes but I can do 7 & can't meet by the crib but I' meet you somewhere by dollar gen

A.Y.: Okay bet I'll head there, would you actually be able to do 10 for \$100?

LENTZ: I'll do 8

A.Y.: Okay I'll see if our customer can do that

LENTZ: Lmk before I go outta town
A.Y.: Would you be able to do 9 for \$105? Just trying to get 2 for us because I have a really bad migraine
LENTZ: Yeah I got you
LENTZ: Give me 30 minutes if you can
A.Y.: Okay thank you girl, I have him here rn if you can only do a few rn and the rest later that works
A.Y.: Just let me know when I'm good to come by
LENTZ: Come
A.Y.: Okay, across the street?
LENTZ: Hey be right there

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz conspired with A.Y. to sell A.Y. pressed fentanyl pills with the understanding that A.Y. planned on selling some of the pills to an unknown individual, and some of the pills were for personal use.

F. August 14, 2022 –

A.Y.: Hey are you still around? Have like 4 I could grab for \$40?
A.Y.: Actually would need 5
A.Y.: Sorry girl could we actually grab 8?
A.Y.: Just lmk I'd have to grab them before dude heads to work
A.Y.: What's up?
LETNZ: Wyd
A.Y.: I have a sale for you are you around still?
A.Y.: Also just not really feeling great
A.Y.: And I know Christian isn't feeling well either
A.Y.: I was wondering if you could do like 11 or 12 for \$120?
LETNZ: I got you can you wait like 30
A.Y.: Yeah I can do that
A.Y.: I'll call you around 9?
A.Y.: What's up?
A.Y.: Could we still come grab 12?
A.Y.: You good?
LENTZ: Yes dollar general
A.Y.: Okay bet
A.Y.: Omw
A.Y.: Here and can we actually do 13
A.Y.: I have 130 if you can do 13 and I'm in front of the house

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz conspired with A.Y. to sell A.Y. pressed fentanyl

pills with the understanding that A.Y. planned on selling some of the pills to an unknown individual, and some of the pills were for personal use.

34. Samples of drug-related text messages between Amber Lentz and an individual having a last name beginning with “PA” are as follows:

A. July 2, 2022 –

PA: Yoo
LENTZ: Still do dat 50 pk fa 3?
PA: Yeah
PA: Way
LENTZ: West side
PA: Come to Seymour
PA: Seymour park
LENTZ: B there in like 25
LENTZ: Less than 20 now
PA: Ight
LENTZ: My trick being a b**** might only give me 200 if yu can I got yu on the other hundred omm with in a day. If he don't give me 300 other wise just w.e you'll do, ima b doing Uber all day too so I'll damn near have the rest w in a few hours. && after I drop dude A** off by like 4 if yu need a ride/s I yu coming down broadway. Ill b there in a few h thinks yu my cousin & im giving yu sum rent \$ lmao. So jus have the blues lowkey & bagged if yu can good looks
LENTZ: Pulling up
PA: Ight
PA: Imma Give you 40 rn
PA: And imma put the bag in like a good bag or some
LENTZ: Yeah I only got 200 rn && okay I got yu nbs yu know I'm good for it

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz's inquiry about a “50 pk” is for 50 pressed fentanyl pills for \$300 from PA, with the intention of later selling the pills. Later in the conversation, Lentz stated her “trick” only gave her \$200. Lentz then asked if PA would front her the extra pills and she would pay him back

within a day. Lentz stated she would even be able to pay PA back in a few hours. PA agreed to sell Lentz 40 pills for \$200.

B. July 4, 2022 –

PA: Same spot

PA: How many u need?

PA: I'm Finna Go West Mattafact

LENTZ: I got a bill if yu cool with just give me however many for that and then I mean if you're cool with it I'll owe you like 100-140 tomorrow ?? Just add that on top of what ever I get tomorrow I got that one insurance check coming in and then dude is getting a personal loan oh and then my other Trick just cashed out his stocks and he has like a \$9000 check that he's going to cash tomorrow so I'm a see what I can do but I know for sure I'm gonna need at least 100 pack probably like a half of some Za too I promise I'ma go through you you're the only one that has looked out for me know bull****

LENTZ: Sorry that was a book I'm literally talking into my phone because I'm driving but I just got to the west side I'm damn near pulling up

PA: It's Cool

PA: Just pull up

LENTZ: Here

LENTZ: Pontiac

PA: Where

PA: 2231 crary st ?

LENTZ: Cory

LENTZ: I thought yu said west

LENTZ: 5 away

LENTZ: My bad

PA: Not Cora crary st

LENTZ: Ok here I come my bad crossing the Ashland bridge

PA: Ight I'm on the west it's on the Westside

LENTZ: Here

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz asked PA how much she could get for \$100 ("a bill") and stated that she will need 100 pressed fentanyl pills (a "100 pack"), using PA as a source of supply for pressed fentanyl pills.

C. July 6, 2022 –

PA: I Want 2,100 But It's Like 2 Pills Missing Out Of 1 Pack So 2,050
PA: Or I'll Give it to you for 1,900 if U Get 3
LENTZ: Ok addy
PA: U Finna meet me there now
PA: Meet me at Meier
PA: Meiers
PA: Meyers
LENTZ: B there in 3 nbs
PA: Okay bet I'm Coming now then I'm hitting the road
PA: Come to the take 5 on university
PA: My fault
PA: 2136 university
LENTZ: 2 away
LENTZ: By bad fr I stopped on Dodi and my friends mom talked to me so
I didn't want to cut her off
LENTZ: But I'm on University
PA: U Sure u on u university ?
PA: Cause I Gotta Go
LENTZ: Yes yes promise
* * *

LENTZ: You deffff had this bag in yo balls [four emojis]
PA: [three emojis]

Based on their training, experience, and knowledge of the investigation, officers believe that PA contacted Lentz about a sale of pills for approximately \$2,100. PA stated since one of the packs is missing pills, PA would sell Lentz \$2,050 worth. PA then stated PA would sell Lentz the three packs of pills for \$1,900. Lentz agreed and asked PA for the address of the meet location. Based on their training and experience, officers know that drug dealers often attempt to conceal controlled substances near their genitals as a way to avoid detection.

35. Amber Lentz and an individual having the initials C.A. also communicated via text messages regarding drug sales. One sample, from August 14, 2022, is as follows:

C.A.: What's up

C.A.: I got your money and then I can get rid of 5 right away so would you wanna throw me 10. I can bring you some money back right away if you want

C.A.: I'm over here down the road at the gas station. Let me know what's up please.

LETNZ: My bad stop over

C.A.: Alright. Be threw in 2 min

LETNZ: & I got you on 5 & when you come back I got you on another 5 my bad I'm making steaks meet in the smoke room

LETNZ: Wait

LETNZ: My bad I'm out f***

LETNZ: I have my last 30 to chevela

LETNZ: I'm calling my dude now let me see if my be will Borrow me 5

C.A.: You dobt have any to get rid of it ibhave cash

C.A.: F*** man I got rid of them other ones and I don't have s***

C.A.: Well let me know asap

LETNZ: My guys gonna be here in 20 if you wait I'll give you 10 front

C.A.: Should I still come there.

LETNZ: He said he can sell you 2 for 20 he gave me two I'm calling my guy tho so I should be back good in 30 you have foil ?? I'll smoke one w u too I have 1 left myself

LETNZ: In 20

C.A.: I'm here

LETNZ: Okay give me a little my bad girl fr I forgot chivala got my last 30 my guy said he's crossing the bridge

C.A.: Ok. Well I'm in the driveway. You want me to come back or what

C.A.: You should let me get one of them off you.

C.A.: So I can smoke it lol

C.A.: You want me to come back or what? I don't know what to do here?

LETNZ: Yeah come to smoke room can you get me a pack of cigs out of the \$

C.A.: Never mind. Someone pulled in behind me

LETNZ: My bad && he should be here by the time you get back

Based on their training, experience, and knowledge of the investigation, officers believe that C.A. reached out to Lentz to purchase pressed fentanyl pills. C.A. stated C.A. had the money C.A. owed Lentz and asked Lentz if C.A. could be fronted ten pills.³ C.A. told Lentz she would “get rid of 5 right away,” which based on officers’ training and experience is reference to selling the pills for a

³ When a drug dealer “fronts” drugs to an individual, the dealer gives drugs to that individual and, in turn, expects that individual to sell the drugs and pay back the dealer from the sales proceeds.

profit. Lentz stated that Lentz had just sold the last 30 pills Lentz had to “chevela” and was contacting her “dude” (source of supply) to get more.

36. Amber Lentz and an individual having the initials T.F. also communicated via text messages regarding drug sales. One sample, from August 15, 2022, is as follows:

T.F.: Can you do me one for a bill?
LENTZ: I can but give me alittle bit someone just came and got my last 4 oz I need to see what I got left my guy out for 2 days but I might just go pay 50 more & get more (same shit) but let me see I might have one b left
LENTZ: [an image of a scale with methamphetamine reading 2.31]
LENTZ: I can sell yu this for 75? 2.3 rock
LENTZ: The other stuff weighs up to 3 but it's from what I was gonna hot rail so it's like powder. Other wise if you give me like an hour Ima go get more.
T.F.: Will you take 70? What kind of earrings do you like lol
T.F.: For the rock
LENTZ: [an image of cross earrings]
LENTZ: Either studs or like small dangly ones && yeah I got you
LENTZ: lmk when you want me to come
LENTZ: I'm coming now in 3 garage
T.F.: Now if you want

Based on their training, experience, and knowledge of the investigation, officers believe that Lentz sold T.F. approximately 2.3 grams of suspected methamphetamine for \$70 and earrings.

37. Samples of drug-related text messages between Amber Lentz and an individual having the initials P.B. are as follows:

A. August 16, 2022 –

P.B.: What up
P.B.: Need 3
LENTZ: When
P.B.: I was wondering if you would be able to come here this this time pick up your stuff to fix your car and I can fix your car and stuff and I was going home if I buy three if you could front me one
P.B.: Lmk
LENTZ: Hey I'm out for a day
P.B.: Danm you be good tomorrow

B. August 17, 2022 –

P.B.: I am not trying to complain I know it's a couple days after but that last one was pretty light only weighed up to 21.21 don't know I didn't wait until just now but I guess let me know what's up with that

P.B.: What up then you good

LENTZ: I got you on a extra 2 balls next time nbs my bad about that

LENTZ: I got a new scale now my last one was a bud one so it wasn't the most accurate

C. August 19, 2022 –

P.B.: Yeah that last girl that I got from you my cookers were not too happy with it do you got a better quality of the girl

LENTZ: I got diff s*** of that yes

P.B.: Is the stuff that I get in yet

LENTZ: My guy texted me last night saying either last night or this morning so hopefullyyyyt right when he wake up I'll be good give me a few hours I'll lyk asap

P.B.: And then we're putting that system in your car right and then talk about that other thing the trade and about either a couple of dollars or some product and I got a plan but I might need a little backing

LENTZ: Okay we'll just let me know

P.B.: Can I call you

LENTZ: I just seen this he's

LETNZ: Yes

P.B.: Who he

LENTZ: [an image of text conversation believed to be source of methamphetamine]

P.B.: So 3 hours

LENTZ: My bad my guy said few hours now he not replying but I really believe he'll be back or he already is I'll get back to you in an hour

LENTZ: Like 2 hours ima be good

P.B.: Call me man I just woke up I'm sorry I'm sorry let me know

P.B.: Should I be omw

P.B.: omw

P.B.: Can you meet me

LENTZ: Where

LENTZ: My bad I was breaking down my stuff

P.B.: Flet Farm

P.B.: We just come to you

P.B.: Address we just about to 29

P.B.: Passing maple woods

P.B.: Address

LENTZ: 1681 ninth park right across from there, it's valid if you feel safe like spinning the block while we do it that would b cool or just we'll make it fast I don't like sitting in one place like that! But

I'm getting it all ready and shoes on text when pulling up && hey
o didn't find no done today but my guy said he got you totmroek
forsure forsur tomorrow

LENTZ: My bad forgot to press send

P.B.: No down

P.B.: So you could not get any down

LENTZ: No I couldn't I'm sorry I'm calling one more guy but I'm not
gonna lie I never got in to that so I don't even wanna send you off
and get bad stuff or have someone try goofy shit because peopme
in Green Bay be sheisty but this one guy I called I trust & I have
a girl that does it I can have her try it I'll buy it for you and hold it
for you ?? He said he'll be back tomorrow

LENTZ: 1687 ninth

LENTZ: It's like a street right behind ninth how long about ? & what kind
of car I'll be out in a few

LENTZ: Call me

LENTZ: You okay

LENTZ: I have all the up & I got blues

D. August 21, 2022 –

P.B.: Call me asap plz want grab more [praying hands emoji]

LENTZ: Ok call

LENTZ: Lmk

P.B.: Just called

P.B.: [Name] Boy [Mobile phone number]

P.B.: Plz don't forget about my newph

P.B.: Damn how you going to raise the price of extra 400 when we agreed
at 8:00 for two remember this is for me not no one else

LENTZ: What you mean I told you 6 for 1 400 for the 2nd one so 6+4

LENTZ: 4 or more for 450 each

P.B.: Damn I thought we said \$400 a piece but s*** he ain't going to be
able to grab nothing now and I have to wait till tomorrow because I
didn't send him with enough money all right I guess I'll hit you up
tomorrow or something

LENTZ: You got cash app ?

LENTZ: && lowest I can do is 450

LENTZ: Or like 2 balls or alittle more for like 100 a ball

P.B.: No I need two zips on no I do not have cash app I don't know now I'll
have to wait until he gets back see what I got left for money and go
from there probably have to do this tomorrow unless you feel like
driving up here

LENTZ: Yeah man I'm sorry): my guys sleeping I even knocked on his
door and pretended to be Uber eats and he didn't answer

P.B.: What you mean

LENTZ: Because I needed to get like a half old more because I was a little bit short and my guys not replying I was supposed to get them a few hours ago but I totally fell asleep that your friend that's calling my phone or no

P.B.: That my my nephew

E. August 22-23, 2022 –

P.B.: What up

LENTZ: I am just got back good

LENTZ: My bad about yesterday fr

P.B.: It's all good can you come closer to me this time let me see how much loot I got

LENTZ: Okay I can meet yu in Pulaski if that works ? Other wise I'll b in gb for a few hours

P.B.: So what I need for 3 full

LENTZ: 1350

P.B.: Let me see what I got

LENTZ: Lmk just go to gb

P.B.: I'll be omw in ten

LENTZ: Okay bet drive safe

[Time stamp switches to August 23, 2022]

P.B.: Okay we jumping on the road but I was going to see if you could meet me on 29 right as you pull into Green Bay

LENTZ: 1XXX Lancelot Ct Pulaski, WI 54162 United States

P.B.: Should I head there

LENTZ: Tell me what gps says please

LENTZ: How long I

LENTZ: Wya

LENTZ: So 3 ?

P.B.: Yes

P.B.: You said 1350 not

P.B.: Cuz that's all I brought with me

LENTZ: Yeah I got u

P.B.: Sweet what just happened did we just be come best friends yes

LENTZ: Lollllll I thought we been _ ima get in your car quick if that's cool

LENTZ: I got some snow still only like 3 gs & some fire bud

P.B.: Yeah when you jump in jump on the passenger side in the back

LENTZ: Okay bet who w you ? They valid ??

LENTZ: && can't be too long this town really quiet I don't like to stand out so just turn music down && how long cause I gotta drive there but only like a 1 minute drive

LENTZ: I got them ready for yu rn && mostly all rock but if you need more my guy only have 1 z left ima grab that in the am so this my last 4 after this

P.B.: My bro he's my right hand man fr hun I would be on bull shit 153 we should be there

P.B.: OK I didn't realize how much loot I had
LENTZ: You got more or less
P.B.: I got more but at home
P.B.: 6 minutes out
P.B.: 3 minutes
LENTZ: Okay ima b there in 2 minutes
LENTZ: What vehicle
P.B.: OK my big black Dodge truck four-door
P.B.: Backseat passenger side
P.B.: What up
P.B.: We home thank you

Based on their training and experience, officers know that "girl" and "snow" refer to cocaine, "up" refers to methamphetamine, "zip" refers to one ounce, "blues" refer to pressed fentanyl pills, and "ball" refers to 3.5 grams. Furthermore, based on their training, experience, and knowledge of the investigation, officers believe that P.B. is an ounce-level buyer of controlled substances, including methamphetamine, from Lentz.

38. Based on their training, experience, and knowledge of the investigation, officers believe that the last activity on Amber Lentz's cell phone – prior to her arrest on September 1, 2022 – shows that Lentz had other drug transactions lined up on the night of September 1, 2022, in which Lentz planned to sell controlled substances to individuals.

Evidence of drug-related activities on J.L.A.O.'s cell phone

39. On September 12, 2022, pursuant to a search warrant, officers conducted a forensic download of J.L.A.O.'s cell phone.

40. Based upon their training, experience, and knowledge of the investigation, officers found evidence on J.L.A.O.'s cell phone of communications between J.L.A.O. and other individuals involving the sales of controlled substances, including methamphetamine and other controlled substances.

Amber Lentz's State Drug Charges

41. On September 2, 2022, Amber Lentz was charged in Brown County Circuit Court, Case No. 22CF1587, with six felony counts and seven misdemeanor counts.

42. On January 10, 2023, Amber Lentz pleaded no contest to the following four felony counts: (1) possession of fentanyl with intent to deliver, (2) possession of amphetamine/methamphetamine with intent to deliver, (3) second-degree recklessly endangering safety, and (4) maintaining a drug trafficking place.

43. On March 7, 2023, Amber Lentz was sentenced to seven years in prison and eight years on extended supervision.

J.L.A.O.'s State Drug Charges

44. On September 2, 2022, J.L.A.O. was charged in Brown County Circuit Court, Case No. 22CF1586, with six felony counts and three misdemeanor counts.

45. On March 2, 2023, J.L.A.O. pleaded no contest to the following three felony counts: (1) possession of amphetamine/methamphetamine with intent to deliver, (2) possession of fentanyl with intent to deliver, and (3) possession of a firearm by a convicted felon.

46. On April 21, 2023, J.L.A.O. was sentenced to five years in prison and six years on extended supervision.

Administrative Forfeiture Proceedings

47. The Drug Enforcement Administration (“DEA”) began administrative forfeiture proceedings against the approximately \$13,040.00 in United States currency on the ground that the seized currency was used or intended to be used in exchange for controlled substances or was proceeds of trafficking in controlled substances.

48. On or about February 27, 2023, Amber Lentz filed a claim with the DEA in the administrative forfeiture proceedings to the defendant approximately \$13,040.00 in United States currency.

Warrant for Arrest In Rem

49. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claims for Relief

50. The plaintiff alleges and incorporates by reference the paragraphs above.

51. By the foregoing and other acts, the defendant property, approximately \$13,040.00 in United States currency, was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

52. The defendant approximately \$13,040.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 15th day of May, 2023.

Respectfully submitted,

GREGORY J. HAANSTAD
United States Attorney

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Verification

I, Nicholas Ronsman, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the Drug Enforcement Administration (DEA) in Green Bay, Wisconsin, that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 8 through 40 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Task Force Officer with the DEA.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 05/12/2023

s/Nicholas Ronsman
Nicholas Ronsman
Task Force Officer
Drug Enforcement Administration